

### **REMARKS**

Claims 5-10 are now pending in the Application. Claims 5 and 9 have been amended herein. Claim 9 has been amended herein to more clearly recite the limitations therein. Two paragraphs of the specification have been amended herein to correct obvious errors. No new matter has been added. The Examiner is respectfully requested to reconsider and withdrawn the rejections in view of the amendments and remarks contained herein.

### **SPECIFICATION**

The title of the invention has been stated as being not descriptive. Applicant's representative has amended the title to that suggested by the Examiner.

### **CLAIM OBJECTIONS**

Claims 7 and 8 have been objected to for reciting "film" wherein no previous recitation of a "film" in Claim 5 exists. Claim 5 has been amended herein to recite the formation of a film. As such, the objection to Claim 7 and 8 is now believed to be moot and withdrawal of the instant objection is requested.

Claim 9 stands objected to for a variety of reasons. Claim 9 has been amended herein to more clearly recite the limitations therein. It is believed that the amendment to Claim 9 renders the objection moot and, accordingly, withdrawal of the instant objection is requested.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 5-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Evans et al. (U.S. Pat. No. 5,514,503). Claims 9 and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Evans et al. (U.S. Pat. No. 5,514,503) in view of Tanada et al. (EP 1 189 097 A2) and further in view of Majima (U.S. Pat. No. 5,724,110). These rejections are respectfully traversed.

Claims 5 and 9 call for "at least two of: said first predetermined pitch of said color filters of the same color; a second pitch of meshes formed on a surface of said anilox roller; and a third pitch of meshes formed on a surface of said projection are substantially equal." The meshes on the surface of the anilox roller and on the surface of the projection form marks on the coating liquid that is transferred to the substrate. These marks can interfere with one another and cause moiré which decreases the quality of images formed. An electro-optical device or liquid crystal device made with these limitations align at least two of the pitch of the color filters of the same color, the pitch of the meshes of the anilox roller and the pitch of the meshes on a projection formed on a letter press. By aligning at least two of these three, interference with one another, which can cause moiré, can be minimized and/or prevented and thereby increase the quality of images formed by the electro-optical device or liquid crystal device.

In contrast, the Evans et al. reference is not concerned about moiré nor the interference of marks caused by meshes on rollers used to apply a liquid coating film to a substrate. Rather, the Evans et al. reference is concerned with producing extremely accurate black matrix patterns having well defined, square edges. See column 4, lines

35-41 of the Evans et al. reference. Contrary to what is stated in the Office Action, these well defined edges are not accomplished by precisely aligning the black matrix-raised pattern with roller and transfer layer patterns. Rather, the Evans et al. reference discloses two different methods that can be used and neither is concerned with aligning at least two of the pitch of the color filters of the same color, the pitch of the meshes of a roller and the pitch of meshes on a projection formed on a letter press. In the first method, a raised pattern is formed on a transfer layer 14 by contacting the transfer layer 14, while in a deformable state, with a patterned intaglio roller 18 (with no ink thereon) and hardening the transfer layer 14 sufficiently to retain the embossing pattern obtained from roller 18. The hardening is accomplished by utilizing either thermoplastic inks and cooling the transfer layer at the point of contact with roller 18 or using radiation curable inks and curing the transfer layer 14 during the embossing operation with radiation. The black matrix ink may then be applied to the raised pattern 22 to form a raised black matrix pattern 10. See column 5, lines 37-60 of the Evans et al. reference. In the second method, black matrix ink is deposited into recessed pattern 20 of intaglio roller 18, then cured or otherwise hardened within recess pattern 20, so that the shape of recess pattern 20 is retained by the ink which is then transferred to transfer layer 14.

See column 6, lines 13-19 of the Evans et al. reference. Both of these methods produce a black matrix ink pattern with precisely defined black matrix edges and are not concerned with aligning at least two of the pitch of the color filters of the same color, the pitch of the meshes of a roller and the pitch of meshes on a projection formed on a letter press as called for in Claims 5 and 9.

Furthermore, while the Evans et al. reference does disclose a pattern on intaglio roller 18 that is imparted to transfer layer 14 to form a raised pattern with recesses in which colored ink is deposited, the Evans et al. reference uses such patterns to form relatively large scale projections and recesses in transfer layer 14. These large scale patterns are not the same as the significantly relatively smaller patterns imparted upon a coating liquid by the meshes of the anilox roller and the projection on the letter press which function to enhance the coating liquid holding ability on the rollers and do not to impart a desired raised pattern on the coating liquid. In fact, the Evans et al. reference is silent about any projections or surface features on the various rollers to enhance the coating liquid holding ability much less the aligning of a pitch of these surface features to prevent or minimize interference and moire. Thus, the Evans et al. reference does not contemplate nor is it concerned with making at least two of a pitch of the color filter patterns of the same color, a pitch of the meshes of an anilox roller or a pitch of meshes on a projection on a letter press substantially equal as called for in Claims 5 and 9. In other words, the teachings of Evans et al. to place color ink within the recesses formed by raised pattern on transfer layer 14 is not the same nor similar to the arranging of at least two of the pitches substantially equal as called for in Claims 5 and 9. Thus, for at least these reasons it is respectfully submitted that the Evans et al. reference does not disclose, teach nor suggest the limitations called for Claims 5 and 9 and that Claims 5 and 9 are patentable over the prior art of record.

In rejecting Claims 9 and 10, the Office Action relies upon the Tanada et al. reference. The Tanada et al. reference, however, does not appear to qualify as prior art to the present application under any of the subsections of 35 U.S.C. §102. Accordingly,

it is respectfully submitted that the Tanada et al. reference is not available as prior art in rejecting the claims in the present application. Thus, for at least this additional reason, it is respectfully submitted that Claims 9 and 10 are patentable over the prior art of record.

Claims 6-8 and 10 all depend from Claims 5 and 9 and, therefore, for at least the reasons stated above with reference to Claims 5 and 9 are also not anticipated nor rendered obvious by the prior of record. Accordingly, removal of the instant rejections is requested.

## CONCLUSION

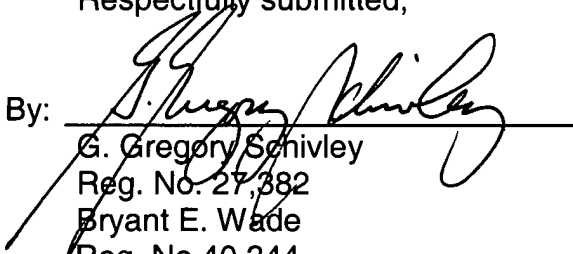
It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant's representative therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

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